UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

WILLIAM P. CHERNICOFF,

Plaintiff,

v.

C.A. NO. 04-10073 NG

NCO FINANCIAL SYSTEMS, INC. LOVELACE HEALTH SYSTEMS, EQUIFAX INFORMATION SERVICES, LLC, BIRCHWOOD CREDIT SERVICES, INC., TRANS UNION CORPORATION, and EXPERIAN NATIONAL ASSISTANCE CENTER,

Defendants.

FED. R. CIV. P. 7.1(a) DISCLOSURE STATEMENT

The undersigned, counsel of record for Experian Information Solutions, Inc., ("Experian") hereby certifies pursuant to Federal Rule of Civil Procedure 7.1(a) that the following listed parties have a direct, pecuniary interest in the outcome of this case. This certification is made to enable the Court to evaluate possible disqualification or recusal:

- 1. Parent Companies: The parent company of Experian is GUS, PLC ("GUS").
- 2. Subsidiaries Not Wholly Owned: Experian does not have any subsidiaries which fall into this category.
- 3. Publicly Held Companies: GUS owns 100 percent of Experian. GUS is publicly traded on the London Stock Exchange.

Dated: June 21, 2005

Respectfully submitted,

\s\Robert S. White

Robert S. White, BBO # 552229 Ellen O'Connor, BBO # 651523 Bourgeois, Dresser, White and Beard 4 Dix Street Worcester, MA 01609

Tel: 508-798-8801 Fax: 508-754-1943

Of Counsel: Christine E. Jennings, Esq. Jones Day 222 East 41st Street New York, NY 10017 Telephone: (212) 326-3732

Facsimile: (212) 755-7306

Attorneys for Defendant Experian Information Solutions, Inc.

CERTIFICATE OF SERVICE

I, Ellen O'Connor, hereby certify that on June 21, 2005 a true and correct COPY OF EXPERIAN INFORMATION SOLUTION, INC.'S ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S COMPLAINT WAS SENT TO:

VIA OVERNIGHT DELIVERY:

Andrew M. Fischer, Esq. JASON & FISCHER 47 Winter Street Boston, MA 02108

Attorney for Plaintiff William Chernicoff

\s\Ellen O'connor ELLEN O' CONNOR